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Proposed Counsel to the Official Committee of  
Unsecured Creditors of Loehmann's Holdings Inc., *et al.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

LOEHMANN'S HOLDINGS INC., *et al.*,

Debtors.

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Chapter 11

Case No. 13-14050 (MG)

(Jointly Administered )

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS  
AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned cases as proposed counsel for the Official Committee of Unsecured Creditors of Loehmann's Holdings Inc., *et al.* (the "Committee"), and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, demand that all notices given or required to be given and all papers served in this case be delivered to and served upon the parties identified below at the following address and further request to be added to the Master Service List:

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile, or otherwise in this case.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the Committee's (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to

which the Committee is or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: December 23, 2013  
New York, New York

KELLEY DRYE & WARREN LLP

By: /s/ James S. Carr  
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